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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MONICA CONTRERAS,

Plaintiff,

v.

RONALD D. FOX; JAMES KENYON;
PATRICIA DONINGER; CLARK COUNTY,
NEVADA; STATE OF NEVADA, ex rel. THE
EIGHTH JUDICIAL DISTRICT COURT,
DOES 1-10; and ROE ENTITIES 11-20,
inclusive,

Defendants.

Case No.: 2:13-cv-00591-JCM-PAL

**PLAINTIFF'S MOTION FOR LEAVE TO
AMEND**

Plaintiff MONICA CONTRERAS moves this Honorable Court for an Order, pursuant to Fed.R.Civ.P. 15, granting leave to amend her Complaint. A copy of the proposed Amended Complaint is attached hereto.

POINTS and AUTHORITIES

Fed.R.Civ.P. 15 provides that when a party seeks to amend its pleading, the Court "should freely give leave when justice so requires." Leave is particularly warranted since this motion is filed far in advance of the scheduled last date for seeking amendment and is being filed prior to the expiration of the applicable statutes of limitation.

1 The proposed amendment eliminates the references to the State of Nevada as a
2 Defendant. Based upon information revealed in Rule 26 disclosures, allegations and claims are
3 added against an additionally named defendant, court Marshall Gregory Bryant. Also, in view
4 of matters in the Rule 26 disclosures and matters developed through further investigation and
5 research, the Fourteenth through the Sixteenth Claims for Relief have been added.
6

7 **CONCLUSION**

8 Particularly since this motion is filed prior to the expiration of the statute of limitations
9 and in view of the standard in Fed.R.Civ.P. 15, it is respectfully requested that the Court issue
10 an Order granting leave for the filing of the proposed Amended Complaint.
11

12 DATED this 7th day of August, 2013.

13 s/ Ross C. Goodman, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of August, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, as follows:

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